

**UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION**

In re

Chapter 9

CITY OF DETROIT, MICHIGAN,

Case No. 13-53846

Debtor.

Hon. Steven W. Rhodes

**RESPONSE TO ORDER REQUIRING IDENTIFICATION OF LEGAL
ISSUES RELATING TO CONFIRMATION**

NOW COME DEBORAH RYAN, WALTER SWIFT, CRISTOBAL MENDOZA and ANNICA CUPPETELLI, interested parties and call this court's attention to the following legal issues that are soluble without the introduction of evidence or the calling of witnesses:

1. Whether the Debtor's Proposed Plan of Adjustment – and its various iterations in the form of Amended Plans – would, if adopted, violate the Fourteenth Amendment to the United States Constitution, in that they would diminish and /or eliminate the relief and recovery available to victims of constitutional violations by the City of Detroit and its officials, agents, employees, police officers and others, otherwise available under 42 USC §1983 and thereby deprive those victims of the full and complete relief to which they are constitutionally entitled.

2. Among other ways in which these interested parties will be deprived of rights guaranteed by the Constitution, the following are included:

- a. The right to full and complete compensations and relief;
- b. The right to full compensation for costs and attorneys; and
- c. Punitive damages.

3. The grounds and bases these assertions of unconstitutionality are set forth in the following docket entries, herein: Dkt. #s 4099, 4099-1, 4099-2, 4140, 4228, 4392 and 4608.

WHEREFORE, these Petitioners request that, for these reasons as well as those identified in the aforementioned docket entries, this court refuse to confirm the Proposed Plan of adjustment, along with its various iterations in the form of Amended Plans.

Respectfully submitted,

GOODMAN & HURWITZ, P.C.

By:/s/William H. Goodman

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*Attorneys for Deborah Ryan, Walter Swift,
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Dated: May 27, 2014

CERTIFICATE OF SERVICE

I hereby certify that on May 27, 2014, I electronically filed *Response to Order Requiring Identification of Legal Issues Related to Confirmation of Creditors Deborah Ryan, Walter Swift, Cristobal Mendoza and Annica Cuppetelli, Interested Parties* and this *Certificate Of Service* attached, with the Clerk of the Court for the United States Bankruptcy Court, Eastern District of Michigan, Southern Division using the ECF System, which will send notification of such filing to all attorneys and parties of record registered electronically.

GOODMAN & HURWITZ, P.C.

By: /s/William H. Goodman
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